

Thanks for the opportunity to comment on this issue. It seems to me there are a number of technological and procedural barriers to be overcome in the creation of a safe and useful BPL system. Some of them are:

- 1) serious potential for widespread and wideranging radio frequency interference, as demonstrated by the ARRLs filed comments,
- 2) lack of mechanisms within utility companys for reporting, researching and resolving interference complaints
- 3) a generally unenlightened user community who will not understand interference when they encounter it.

The easiest answer to these problems is to just not go there. But on the other hand, high speed internet accessibility is a wonderful resource.

I suggest that the Commission should allow BPL to go forward under a strictly managed testbed regime. Before and after spectrum noise levels need to be measured. Interference management procedures within the BPL provider need to be monitored closely. In fact, I suggest that BPL customers should be encouraged to contact the BPL provider under any circumstances of suspected interference or increases in RF noise levels. The costs associated with interference management and consumer education need to be borne by the BPL service provider.

If, as the ARRL seems to contend, BPL technology cannot be made workable in a non-interfering way, then it would be best to find that out before whole systems are rolled out and consumers discover that their cordless phones, garage door openers, rf remote controls, AM radios, and other devices are mysteriously failing or no longer effective.